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Attorneys for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH**

**FRANCISCO RODRIGUEZ,
INDIVIDUALLY AND ON
BEHALF OF OTHERS
SIMILARLY SITUATED,**

Plaintiff,

v.

CASCADE COLLECTIONS, LLC,

Defendant.

PROPOSED CLASS ACTION

**Declaration of Francisco Rodriguez
in Support of Plaintiff's Motion for
Class Certification**

Case No.: 2:20-cv-00120-JNP-DBP

District Judge: Jill N. Parrish

Magistrate Judge: Dustin B. Pead

I, Francisco Rodriguez, declare:

1. I am the named Plaintiff in this above captioned class action against Cascade Collections, LLC. If called as a witness, I would competently testify to the matters herein from personal knowledge. I am filing this declaration in support of Motion for Class Certification.
2. I have kept updated with the progress of this litigation through my attorneys.

3. I am willing to serve as a class representative and have been since I first joined this lawsuit around November 2019.
4. I understand my tasks as a class representative and I have participated throughout this litigation in the belief I was helping all other persons similarly situated.
5. Specifically, I reviewed the Complaint in this case before it was filed, assisted counsel with responding to discovery requests, sat for my own deposition, and helped prepare a declaration in support of this motion. I have spent hours fulfilling my class representative duties for this case.
6. I support my attorney, Kazerouni Law Group's request to be confirmed as class counsel for purposes of this action.
7. I am unaware of any legal differences in my status as a Class Member from the other Class Members, nor of any unique factual issues pertaining to such representative status which must be litigated. To my knowledge, I have no conflict with the other Class Members.
8. The claims which I have asserted in the Complaint seem to be the same as the claims of the other class members, and my claims relate to the same issues of law and fact as the other class claims.
9. I understand the obligations as serving as class representative, have, and will adequately represented the interests of the putative class, and I have retained experienced counsel.
10. Neither myself, nor anyone in my family have any financial interest in this matter besides what may eventually be awarded by this Court. I further avow to put the Class Member's interest ahead of my own.

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I declare under penalty of perjury in the State of Utah that the foregoing is true and correct. Executed on July 15, 2020 in Utah.

A handwritten signature in black ink, appearing to read 'Francisco Rodriguez', is written over a horizontal line.

Francisco Rodriguez